

Exhibit A

Instructions and Definitions

- A. The following defined terms shall have the corresponding meanings set forth below:
- i) “Advantage” shall mean Advantage Construction, Inc., and any subsidiary, parent or affiliate thereof.
 - ii) “Debtor” shall mean Lindsay Lampasona, LLC, the debtor in chapter 7 Case Number 11-19747, pending in the United States Bankruptcy Court for the District of Massachusetts, and any subsidiary, parent or affiliate of the Debtor.
 - iii) “Rykor” shall mean Rykor Concrete & Civil Inc., and any subsidiary, parent, or affiliate thereof.
 - iv) “You” or “your” shall mean John Kelly or any entity controlled by John Kelly.
- B. The term “document” or “documents” shall mean any writings, letters, memoranda, correspondences, electronic mail, memoranda or notes of conferences or telephone conversations, reports, lists, compilations of data, papers, books, records, contracts, deeds, leases, agreements, transcripts, tapes, microfilm, computer data files, printouts, vouchers, accounting statements, checks, deposit slips, pleadings, and all other tangible things upon which any handwriting, typing, printing, drawing, representation, photostatic, or other magnetic or electrical impulses or other form of communication is recorded, stored or produced, including audio and video recordings and computer-stored information, whether or not in printout form. These terms shall also mean copies of documents even though the originals are not in your possession, custody or control; every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original of any other copy; and all attachments to any document.
- C. The term “concerning” means relating to, referring to, describing, evidencing or constituting.
- D. The present tense includes past and future tenses. The singular includes the plural, and the plural includes the singular.
- E. Please provide a schedule identifying each document withheld on the ground of privilege or otherwise and set forth: (a) the date of the document, (b) the nature of the document, (c) the person who originated the document, (d) the person to whom it was sent, (e) the subject matter of the document, and (f) the privilege or other ground upon which the document is withheld.
- F. Documents are to be produced for the period January 1, 2008 to the present.

Documents Requested

1. All documents concerning any payments from you, to or for the benefit of Mary Lampasona, or any promise or agreement for payments from you, to or for the benefit of Mary Lampasona, including but not limited to:
 - a. Any bank statement evidencing such payment.
 - b. Any cancelled check evidencing such payment.
 - c. Any communication concerning such payment.
 - d. Any agreement concerning such payment.
 - e. Whether or not such payment was actually made, any documents concerning any discussion of, contemplation of, or intention of making such payment.
2. All documents concerning any payments from Advantage, to or for the benefit of Mary Lampasona, or any promise or agreement for payments from Advantage, to or for the benefit of Mary Lampasona, including but not limited to:
 - a. Any bank statements evidencing such payment.
 - b. Any cancelled checks evidencing such payment.
 - c. Any communication concerning such payment.
 - d. Any agreement concerning such payment.
 - e. Whether or not such payment was actually made, any documents concerning any discussion of, contemplation of, or intention of making such payment.
3. All documents concerning any payment from Rykor, to or for the benefit of Mary Lampasona, or any promise or agreement for payments from Rykor to or for the benefit of Mary Lampasona, including but not limited to:
 - a. Any bank statements evidencing such payment.
 - b. Any cancelled checks evidencing such payment.
 - c. Any communication concerning such payment.
 - d. Any agreement concerning such payment.
 - e. Whether or not such payment was actually made, any documents concerning any discussion of, contemplation of, or intention of making such payment.